

From: [John Hebert](#)
To: [Russell Wasem](#)
Cc: [Jennifer Gaines](#); [Dan Peacock](#)
Subject: Re: Fw: Mitigation- Rodenticides Questions
Date: 07/07/2009 11:22 AM

hey rusty - thanks for clarifying that with Bell. part of my problem is that i have been using the original RMD from 5/08. i need to get an updated copy. i think the best answer to give Bell is that it doesn't matter when a label/product is amended/reregistered - everyone will be able to market their products under old, non-compliant labels until June 2011. we've been adding revised existing stocks language to everything we approve. and after June 2011 anything released must comply with the mitigation. let me know if you think that won't answer his question.

john

▼ Russell Wasem---07/06/2009 05:02:36 PM----- Forwarded by Russell Wasem/DC/USEPA/US on 07/06/2009 05:02 PM -----

From: Russell Wasem/DC/USEPA/US
To: John Hebert/DC/USEPA/US@EPA
Date: 07/06/2009 05:02 PM
Subject: Fw: Mitigation- Rodenticides Questions

----- Forwarded by Russell Wasem/DC/USEPA/US on 07/06/2009 05:02 PM -----

From: "John Lublinkhof" <jlublinkhof@belllabs.com>
To: Russell Wasem/DC/USEPA/US@EPA
Date: 07/06/2009 04:59 PM
Subject: Re: Mitigation- Rodenticides Questions

Rusty,

Yes, I am referring to that table.

Best regards,

John Lublinkhof
Bell Laboratories, Inc.

-----Original Message-----

From: Wasem.Russell@epamail.epa.gov
To: "John Lublinkhof" <jlublinkhof@belllabs.com>
Date: Mon, 6 Jul 2009 16:54:12 -0400
Subject: Re: Mitigation- Rodenticides Questions

> Good Afternoon John,
>
> When you cite page 30 of the RMD, are you referring to the table
with
> the heading "3 Years after Publication of the Federal Register
Notice
> Announcing the. . ." or something else?
>
> Rusty_____
>
> Rusty Wasem
> Chemical Review Manager
> Special Review & Reregistration Division
> Office of Pesticide Programs

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> (703) 305-6979
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> |"John Lublinkhof"
<jlublinkhof@belllabs.com>
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> |Russell
Wasem/DC/USEPA/US@EPA
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> Rusty,
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>
> Thanks for your response. I need a little further clarification
> regarding Item 2. we understand that old labels can be placed on
> packages that are produced until June 2011. My question is regarding
> the
>
> stock that is potentially left in the warehouse after production is
> ceased with the old labeled material i.e. product for which
amendments
> were sought. My other point is that there is no mention of this in
the
> June 18, 2008 letter sent to registrants. However, on Page 30 of the
> mitigation decision document, it reads that the manufacturer would
have
> 6 months beyond June 2011 to release this for shipment. Is this
> correct?
>
> Thanks,
>
> John Lublinkhof
> Bell Laboratories, Inc.
>
> -----Original Message-----
> From: Wasem.Russell@epamail.epa.gov
> To: "John Lublinkhof" <jlublinkhof@belllabs.com>
> Date: Wed, 1 Jul 2009 17:17:15 -0400
> Subject: Re: Mitigation- Rodenticides Questions
>
> > Good Afternoon John,
> >
> > To answer your questions.
> >
> > 1. We will treat labeling for the rodenticide bait stations as we
do
> > for other similar bait stations (e.g., ant/roach stations). For
> those
> > we require the following to be on the station: product name,
> > registration number, a.i. statement, signal word with a modified
> KOROC
> > statement like "Do not allow children or pets to play with the
bait
> > station", and a referral statement to the complete labeling.
> > Rodenticide bait stations will also require labeling statement
> > corresponding to which Tier it achieves (taken directly from the
> RRM).
> > Due to the size of mouse stations complete labels are an option,
at a
> > minimum mouse bait stations must contain all of the details
mentioned
> > above.
> >
> > 2. if the mitigation language is added by an "amendment" and not
by
> > reregistration we will allow old labels to be used through June
2011.
> >
> > Please let me know if you have any further questions.
> >
> > Regards,
> >
> > Rusty_____

> > Rusty Wasem
> > Chemical Review Manager
> > Special Review & Reregistration Division
> > Office of Pesticide Programs
> > (703) 305-6979
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> > |----->
> > | From: |
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> > |Russell Wasem/DC/USEPA/US
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